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Date 10.30.26
Clerk of the Board of Supervisors
By Michelle Gonzales, Deputy

VIA U.S. MAIL

October 27, 2026

County of Kern
Clerk of the Board of Supervisors
1115 Truxtun Ave., 5th Fl.
Bakersfield, CA 93301

NOTICE OF CLAIM AND INTENT TO PURSUE LEGAL ACTION

PURSUANT TO CALIFORNIA GOVERNMENT CLAIMS ACT, Sec 910, et seq.

To the Clerk of the Governing Board,

This office represents USC Norris Comprehensive Cancer Center (USC) ("Hospital"), located at 1441 Eastlake Ave. 7416, Los Angeles, CA 90089-0112, regarding its claim against the County of Kern for unpaid or underpaid hospital services.

The following patient account/encounter information is being submitted pursuant to Cal. Gov. Code §910, in an effort to resolve the dispute without the need for legal action by the Hospital.

Hospital:	USC Norris Comprehensive Cancer Center		
Last Name:	George	Total Charges:	$112,752.05
First Name:	David	Expected Reimbursement:	$50,738.43
Service Dates:	See Below	Insurance Payments:	$14,160.64
Account #:	See Below	Patient Responsibility:	$0.00
Payor Plan ID:	2024000717	Active Balance:	$36,577.79
ICN #:	2024000717	Jurisdiction:	Unlimited

Account no. 804706869 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **July 31, 2025**, for outpatient chemotherapy to treat pancreatic cancer. He received an infusion of cancer-fighting drugs and was discharged the same day. At the time of his admission, Mr. George was covered by County of Kern workers' compensation administered by CorVel. The billed charges for the admission were $21,267.95. The expected reimbursement under the asserted HealthSmart contract is $9,570.58. County of Kern paid $1,601.64 after erroneously issuing payment at the "highest payment that any other non-exempt facility would receive." Section 9789.22(k) is paid at a "reasonable cost" basis, which the County/Corvel's payment does not meet the standard of "reasonable cost" basis. The hospital requested second bill review, and the County/Corvel paid an additional $665.82. The hospital is entitled to payment under the "Direct Rate" specifically outlined in the contract for situations

when the OMFS rate isn't applicable. County/Corvel assigned no patient responsibility. The balance owed on the account is $7,303.12.

Account no. 805024858 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **August 02, 2025**, for outpatient infusion and injection treatment for pancreatic cancer that had spread to his liver. The services were authorized under authorization number 31665. Mr. George received intravenous hydration and pegfilgrastim-jmdb treatment and was discharged the same day. At the time of his admission, his workers' compensation claim was administered by CorVel for County of Kern. The billed charges for the admission were $11,281.25. The expected reimbursement under the contract is $5,076.56. County of Kern paid $1,942.20, applying an erroneous alternate workers' compensation fee schedule and stating that no network contract or letter of agreement governed the services. The hospital submitted a first-level appeal and request for second bill review seeking payment under the HealthSmart contract. CorVel upheld its payment determination. County of Kern assigned no patient responsibility. The balance owed on the account is $3,134.36, plus attorney fees.

Account no. 805553666 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **August 14, 2025**, for outpatient chemotherapy for cancer of the pancreas that had spread to the liver and bone. The chemotherapy was authorized under authorization number 2024000717. Dr. Diana Hanna administered a multi-drug chemotherapy regimen, and Mr. George was discharged the same day. At the time of his admission, Mr. George was covered by a workers' compensation plan administered by Corvel Corporation WC 277550, with the County of Kern as the employer. The billed charges for the admission were $21,013.70. The expected reimbursement under the hospital's HealthSmart workers' compensation contract was the Direct Rate of 45% of billed charges or $9,456.17. Corvel paid $2,356.69, the hospital filed an underpayment appeal on April 1, 2026, and Corvel upheld the denial on April 14, 2026, stating the appeal was outside the timely filing limit. The hospital requested a second bill review, and Corvel again denied the request as outside the 90-day rule. CorVel is failing to acknowledge that the Hospital made numerous attempts and received communication from Kern County Claims Adjuster Teena Carlile as to why the payment was significantly delayed. The Hospital received the 835 EOB on or about March 18, 2026, and submitted the Second Bill Review within 90 days on April 1, 2026. Corvel assigned no patient responsibility. The balance owed on the account is $7,099.48 plus interest and attorney fees.

Account no. 806142105 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **August 16, 2025**, for an outpatient pegfilgrastim injection as part of his treatment for pancreatic cancer. The service was authorized under authorization number 31665. Mr. George received the injection and intravenous hydration and was discharged the same day. At the time of his admission, Mr. George was covered under a County of Kern workers' compensation claim administered by CorVel. The billed charges for the admission were $11,269.25. The expected reimbursement under the contract is the Direct Rate, which equals

$5,071.16. The County paid $1,942.20 on March 18, 2026 and the hospital appealed the resulting underpayment on March 25, 2026, and CorVel determined that the appeal was outside its filing period before denying the subsequent reconsideration as duplicative. The County assigned no patient responsibility. The balance owed on the account is $3,128.96, plus attorney fees.

Account no. 806240990 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **August 28, 2025**, for outpatient treatment of pancreatic cancer. He received intravenous chemotherapy and was discharged the same day. At the time of his admission, Mr. George was covered under the County of Kern workers' compensation plan. The billed charges for the admission were $20,442.70. The expected reimbursement under the contract is $9,199.22. County of Kern paid $2,018.34 through CorVel, applying workers' compensation fee-schedule pricing. The hospital appealed the underpayment and submitted the bill, supporting records, and an independent bill review request; the appeal was upheld before an additional payment was issued. County of Kern assigned no patient responsibility. The balance owed on the account is $7,180.88 and attorney fees.

Account no. 806156816 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **August 31, 2025**, for an outpatient injection, medication used to support white-blood-cell recovery during treatment for pancreatic cancer that had spread to the liver. The service was authorized under authorization numbers 31665 and 2024000717. At the time of admission, Mr. George was covered by the County of Kern's workers' compensation plan, administered by CorVel. The billed charges for the admission were $10,003.00. The expected reimbursement under the contract is the Direct Rate of $4,501.35. County of Kern paid $1,586.28 after CorVel applied its erroneous exempt-facility fee methodology. The hospital submitted a Second Bill Review requesting payment under the contract, and County of Kern upheld the original payment on January 22, 2026. County of Kern assigned no patient responsibility. The balance owed on the account is $2,915.07 plus interest and attorney fees.

Account no. 811318187 - D. George, a 49-year-old man, was admitted to USC Norris Comprehensive Cancer Center on **November 14, 2025**, for outpatient intravenous chemotherapy to treat pancreatic cancer that had spread to other parts of his body. The treatment was authorized under authorization number 31665. Mr. George received intravenous chemotherapy and was discharged the same day. At the time of his admission, Mr. George was covered by CorVel Workers Comp. The billed charges for the admission were $17,474.20. The expected reimbursement under the contract is the Direct Rate, which equals $7,863.39. CorVel paid $1,747.71 and later paid an additional $311.76 after the hospital submitted a second-bill-review request disputing the contract-rate underpayment. CorVel assigned no patient responsibility. The balance owed on the account is $5,803.92, plus attorney fees.

Corvel continues to apply an erroneous rate that doesn't meet the standard of "reasonable cost" basis in accordance with C.C.R. Title 8 Section 9789.22(k). The contract has a clearly defined rate when the OMFS rate doesn't apply.Please review the attached patient account information,

along with previously submitted medical records and reprocess the claim. Consistent with State law, if we do not receive a response to this claim within 45 days, we will deem it denied and proceed with appropriate legal action to resolve the dispute.

If you have any questions or need any further information, please feel free to contact our office at (562) 901-4499.

Very truly yours,

Michael Becerra

Michael Becerra
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Notices/Correspondence regarding this claim to be sent to:
Helton Law Group
A Professional Corporation
1590 Corporate Drive
Costa Mesa, CA 92626

PLEASE NOTE: Helton will accept electronic services of all documents including written responses required under the California Code of Regulations, and the California Government Code. Please send electronic responses to ProviderResponse@Helton.Law